



Catherine
Collins/P2/R8/USEPA/US
05/27/2003 11:40 AM

To dklemp@state.mt.us
cc
bcc
Subject Check lists for program reviews

Dave -- Please take a look at these check lists for the NSR and T5 program reviews and let me know if you think that we can get both of them done the week of June 23rd. We may fly in on Sunday. Will let you know the details later.

Please let me know by Thursday morning or earlier if we can do both program reviews. Thanks



NSR prgm review Quest_PA_11.wj title V program evaluation questionnaire.v
Catherine Collins
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Catherine Collins

06/19/03 12:16 PM

To: Christopher Ajayi/P2/R8/USEPA/US@EPA, Mike
Sewell/RTP/USEPA/US@EPA
cc: Callie Videtich/P2/R8/USEPA/US@EPA, dklemp@state.mt.us,
dskibicki@state.mt.us
Subject: Program Review Agenda

Program Reviewers:

Here is a rough agenda for our program review for the week. This should maximize both the Montana staff's time and our time.

Monday 10-11 am -- Arrive and begin Title 5 checklist review

Tuesday 7:30 am -- Begin NSR check list review
2:30 pm -- Title 5/NSR permit file reviews

Wednesday 7:30 am -- Continue NSR/T5 check list review
2:30 pm -- Title 5/NSR permit file reviews

Thursday 7:30 am -- Continue NSR/T5 check list review
2:30 pm -- Develop and present preliminary findings for NSR review

Friday 7:30 am - 11:30am -- Develop and present preliminary findings for T5 review

We will be able to begin our days with the State at 7:30 in the morning. Monday will be the start of the Title 5 portion of the checklist. The

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Catherine
Collins/P2/R8/USEPA/US

02/17/2004 10:57 AM

To dklemp@state.mt.us, dwalsh@state.mt.us,
dskibicki@state.mt.us

cc

bcc Callie Videtich/P2/R8/USEPA/US@EPA

Subject NSR and Title V program Reviews

Dave, Debbie and Dan -- Attached are the NSR and Title V program draft reports. Please review and provide any comments you may have back to me. I did not include any appendix materials, but these will be included in the final report. Please call and we can discuss how to best handle any edits you may have.



2003 titleV program review final 120403 (WP5). doc MT NSR program review june 2003 final final report

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Catherine
Collins/P2/R8/USEPA/US
07/07/2004 10:42 AM

Laurie Ostrand/P2/R8/USEPA/US@EPA, Jonah
Staller/RC/R8/USEPA/US@EPA, Sara
To Laumann/RC/R8/USEPA/US@EPA, Douglas
Latimer/P2/R8/USEPA/US@EPA, Kevin
Golden/P2/R8/USEPA/US@EPA
cc Callie Videtich/P2/R8/USEPA/US@EPA

bcc

Subject Montana NSR Program Review

Thank you for reviewing the last draft of the Montana NSR Program Review. Here is a real draft version that has addressed the issues you raised. Please take one last look and identify any concerns you may still have. I will be sending this to the State on Monday for their review. If I do not hear from you, I will assume that you have no further comments. A concurrence copy of the report will be routed after the state has had an opportunity to comment and before the report is finalized.

Please call me if you have any questions or would like to discuss a particular issue. I will be in today, Thursday and Friday.



MT NSR program review FINAL report JULY 2004.

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Catherine
Collins/P2/R8/USEPA/US

07/12/2004 08:18 AM

To dklemp@state.mt.us, dwalsh@state.mt.us

cc

bcc Callie Videtich/P2/R8/USEPA/US@EPA

Subject Draft NSR Program Review

Dave and Dan -- As agreed upon in the NSR Review, EPA said it would share the draft report prior to finalization. Attached is the Draft NSR Program Review Report for your review. Please let me know if you have questions, comments or concerns. We can handle the comments in a number of ways, either electronically or via telephone (either one on one or a conference call). Please let me know what works best for you. This is a word perfect document and doesn't translate well between programs. One good note is by the end of the summer, we should be using MS word so the transfer of documents will be easier. I have not included any of the attachments, but you will get those with the final report.



MT NSR program review FINAL report JULY 2004.

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Catherine
Collins/P2/R8/USEPA/US
09/15/2004 08:24 AM

To dwalsh@state.mt.us
cc
bcc
Subject NSR Program Review

Dan -- Attached is the version that incorporates the comments we discussed last week. Please let me know if you have further concerns. -- Catherine



MT NSR program review FINAL report JULY 2004.wpd

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Catherine Collins

06/22/04 09:06 AM

To: Kevin Golden/P2/R8/USEPA/US@EPA

CC:

Subject: NSR Program Review Information

Kevin -- This was submitted to us by Montana as part of the NSR Program review. You had made a comment that we needed to look at these. Could you please take a few moments to evaluate these and let me know if you have any comments to add to the report. Thanks for your continuing helping on completing this project. -- Catherine

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----- Forwarded by Catherine Collins/P2/R8/USEPA/US on 06/22/04 09:04 AM -----



"Klemp, Dave"
<dklemp@state.mt.us>

06/11/04 09:19 AM

To: Catherine Collins/P2/R8/USEPA/US@EPA

CC:

Subject: NSR Program Review Information

Catherine,

As we discussed yesterday, attached is an electronic version of our monitoring guidance. Also, our modeling guidance is titled "Montana Modeling Guidelines for Air Quality Permits" and this is available through the Montana DEQ homepage on the web-site. Finally, NAD stands for "North American Datum". I think that was all of the outstanding information you needed from me. If you need anything else, just let me know.

Thanks
Dave Klemp



MONITOR.POL

DEPARTMENT OF ENVIRONMENTAL QUALITY
PERMITTING AND COMPLIANCE DIVISION
AIR AND WASTE MANAGEMENT BUREAU

OFFICE MEMORANDUM

TO: Permitting Staff

DATE: October 9, 1998

FROM: David Klemp

SUBJECT: Monitoring Requirements

GUIDANCE STATEMENT

The Department of Environmental Quality has a responsibility under the Federal and State Clean Air acts to assure compliance with the State of Montana and Federal ambient standards and PSD increments. This assurance is achieved through two mechanisms: 1) emission allowances determined by dispersion modeling analyses conducted during the permit review of new and altered sources; and 2) ambient monitoring. There are circumstances where the modeling or the monitoring alone are adequate to assure compliance, but the law, the regulations and common sense may require the use of both in many instances.

Under the Administrative Rules of Montana 17.8.105, the Department has the authority to require ambient air monitoring, when it is determined to be necessary. This Guidance Statement will identify when it is necessary for the Air Quality Permitting Staff of the Air and Waste Management Bureau to require ambient monitoring for a source. The Permitting Staff are responsible for making the final determination as to when monitoring is required for a source. Once the determination is made for a source, it is then the responsibility of the Permitting Staff to coordinate with the Monitoring and Data Management Bureau - Air Monitoring Section Staff to ensure that all appropriate information is placed correctly in the permit.

This Guidance Statement is necessary to ensure the Permitting Staff are consistent in determining when monitoring is initially required and when monitoring can be discontinued. This Guidance Statement is intended to be applied to all sources, new and existing, with permitted emissions exceeding 100 tons/yr of a pollutant for which an ambient air quality standard exists, with the exception of portable sources, operating in Montana. However, existing sources would not become subject to the requirements of this policy until a permitting action is undertaken that would result in an increase in the ambient concentration above the levels contained in the Monitoring Decision Table (see next page) that would require monitoring. Permitting Staff should not apply this policy retroactively to sources that are not proposing an increase in emissions or ambient concentrations of pollutants.

When determining whether or not a source should be required to conduct monitoring, the Permitting Staff should consider the degree of confidence the Department has in the source's ability to comply with their permit conditions, whether or not a violation of a condition could be readily detected, and the degree of risk that a permit exceedance might result in an exceedance of an ambient standard. The risk factor will be based on the dispersion modeling results used when the permit was issued to demonstrate compliance with the ambient air quality standards. Permitting Staff will consult with Analytical Services Section Staff of the Monitoring and Data Management Bureau in interpreting the modeling results. The table below should be used by the Permitting Staff when deciding whether to require or to discontinue monitoring.

MONITORING DECISION TABLE

Ambient Monitoring Decision Matrix*				
Confidence Level	Percent of Ambient Standard Consumed in Dispersion Model Analysis			
	≤60%	60%--80%	80%--95%	≥95%
High	No Monitor	No Monitor	DEQ Judgement	Yes Monitor
Medium	No Monitor	DEQ Judgement	Yes Monitor	Yes Monitor
Low	DEQ Judgement	Yes Monitor	Yes Monitor	Yes Monitor

*Modeling will be used to determine if monitoring is initially required. Once monitoring information is gathered and available, future decisions such as when to discontinue monitoring will be based on the monitoring results.

HIGH CONFIDENCE LEVEL

Source is located in an area with no known air quality problems for the pollutant(s) of concern and any sources in the area are small and well regulated. Source also has permit conditions that are easily enforceable and the Department could readily determine if the condition was violated. Permitting Staff are confident that emissions are accurately characterized in the permit.

MEDIUM CONFIDENCE LEVEL

Source is in an area with no known problems for the pollutant(s) of concern and any sources in the area are small and well regulated. Permit conditions are not as easy to enforce but the Department still considers them enforceable as a practical matter. The Department can also readily determine if the condition was violated. Permitting Staff are still confident that emissions are accurately characterized in the permit.

LOW CONFIDENCE LEVEL

Source may be in an area with known air quality problems for the pollutant(s) of concern from existing sources. Permit conditions are difficult to enforce and the Department may not know in a timely manner if the condition was violated. Permitting Staff are not very confident that emissions are accurately characterized in the permit.

When the Permitting Staff are making the decision on the confidence level, the appropriate Department staff (i.e. compliance and modeling personnel) should be consulted. Information such as how the limitations are written (e.g. lbs/hr, tons/yr, etc.), how compliance will be determined (e.g. annual source test, CEMS, etc.), as well as the size and location of the source should all be factored into the decision. The final decision as to which confidence level is appropriate shall be made by the Permitting Staff and should focus primarily on whether the Department has determined that a violation of a standard can reasonably occur.

The Permitting Staff should also keep in mind that not all sources can be directly placed in a specific confidence level. Monitoring requirements for these sources will be determined by the Permitting Staff, after consultation with the appropriate Department staff, on a case by case basis. A log of all determinations should be maintained by the Air Quality Permitting Section to ensure that all determinations are made as consistently as possible.

Those sources that are required to monitor may be allowed to discontinue their monitoring if they have collected information for 5 years without an exceedance of the appropriate trigger level in the table and the Department believes that the source is unlikely to cause a violation of an ambient standard in the future. An exceedance of the trigger level only

occurs when the Department has determined that the cause of the exceedance is attributed to the source and not an act of nature, an equipment malfunction, or some other reason that cannot be tied to the operation of the source. Permits for sources that have monitoring requirements removed should contain a statement that the Department retains the ability to require ambient monitoring in the future if the Department believes there might be a violation of a standard attributed to a specific source.

Permitting Staff may also make case by case determinations concerning monitoring frequency for sources that are required to monitor. Permitting Staff have the discretion to either increase or decrease the monitoring frequency at a site if conditions warrant. This decision will be made by the Permitting Staff after consultation with the appropriate Department staff and the affected source.

This Guidance Statement is only intended to apply to compliance with the ambient air quality standards and does not apply to any increment. This issue will be handled separately.

This Guidance Statement does not supersede ambient air monitoring required as a result of New Source Review or as a result of any State Implementation Plan.



"Klemp, Dave"
<dklemp@state.mt.us>
>

To: Catherine Collins/P2/R8/USEPA/US@EPA
cc: "Walsh, Dan" <dwalsh@state.mt.us>
Subject: RE: Draft NSR Program Review

07/12/04 09:17 AM

Thanks Catherine. We were able to print the document but unable to save it as a WORD document because the file was corrupt. We will comment on the hardcopy and then fax it to you as soon as we can. Our goal will be to get comments back to you by the end of this week or early next week at the latest. dk

-----Original Message-----

From: Collins.Catherine@epamail.epa.gov
[mailto:Collins.Catherine@epamail.epa.gov]
Sent: Monday, July 12, 2004 8:19 AM
To: dklemp@state.mt.us; dwalsh@state.mt.us
Subject: Draft NSR Program Review

Dave and Dan -- As agreed upon in the NSR Review, EPA said it would share the draft report prior to finalization. Attached is the Draft NSR Program Review Report for your review. Please let me know if you have questions, comments or concerns. We can handle the comments in a number of ways, either electronically or via telephone (either one on one or a conference call). Please let me know what works best for you. This is a word perfect document and doesn't translate well between programs. One good note is by the end of the summer, we should be using MS word so the transfer of documents will be easier. I have not included any of the attachments, but you will get those with the final report.

(See attached file: MT NSR program review FINAL report JULY 2004.wpd)

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"Walsh, Dan"
<dwalsh@state.mt.us>
09/17/2004 01:25 PM

To Catherine Collins/P2/R8/USEPA/US@EPA
cc
bcc
Subject RE: NSR Program Review

Catherine,

I believe that the new language is better. However, #1 on page 23 still reads awkwardly. Can it be changed to "EPA encourages MDEQ to continue making BACT determinations in accordance with the principles outlined in the NSR workshop manual."?

Thanks.
dw

-----Original Message-----
From: Collins.Catherine@epamail.epa.gov
[mailto:Collins.Catherine@epamail.epa.gov]
Sent: Thursday, September 16, 2004 7:11 AM
To: Walsh, Dan
Subject: RE: NSR Program Review

Dan -- I have faxed you a copy of the review. Thanks for taking one final look at it. We can talk tomorrow about it, if you like.
--Catherine

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